

LAW OFFICES  
**RUSSO & RUSSO, P.C.**  
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PLEASE REPLY TO TEANECK

DAVID C. RUSSO  
N.J., N.Y., PA., D.C. AND FLA. BARS

425 BEACH ROAD  
TEQUESTA, FL 33469  
(561) 745-3097

October 11, 2016

U.S. Bankruptcy Court  
MLK Jr. Federal Building  
50 Walnut Street  
Newark, NJ 07102

Re: **OBJECTION LETTER**  
**DEBTOR: CAMPBELL, AMOS A. & BEEDY, DEANNA D.**  
**CASE #: 11-18280**

Dear Sir:

Please be advised that this firm represents AMOS A. CAMPBELL and DEANNA D. BEEDY, Petitioners with regard to captioned Chapter 13 bankruptcy matter.

Please accept this letter as a written objection to the Trustee's Motion to Dismiss Petition inasmuch as the Chapter 13 petition has now exceeded the monthly limitation set forth in the plan.

Please be advised that this firm has prepared an Application to retain special counsel for the personal injury matter which is the process of being executed by the professional and shall immediately be filed with the Court upon receipt.

Furthermore, this firm is likewise preparing a Motion for Approval of Settlement and Disbursement of Settlement Proceeds and Notice of Proposed Settlement of Controversy which will likewise be filed with the Court.

I have attached Closing Statement with regard to the personal injury matter.

This firm will be amended Schedule B and Schedule C of the bankruptcy petition in order to properly reflect the anticipated settlement proceeds.

Therefore, I would appreciate if you would not dismiss the Petitioners' bankruptcy case.

Thank you for your courtesies and cooperation. If you should have any questions, please contact me at my Teaneck office.

Very truly yours,

DAVID C. RUSSO

DCR:db

Enclosure

cc: Mr. Amos A. Campbell & DeAnna D. Beedy

**FELICE LAW OFFICES, P.S.**

ROGER A. FELICE ♦ MICHAEL V. FELICE ♦ MICHAEL L. BODEY

OF COUNSEL  
KENNETH ISSERLIS

August 31, 2016

DeAnna Beedy  
Amos Campbell  
79 High Street  
Montclair, New Jersey 07042

Re: Disbursement Profile Absent Bankruptcy Estate  
Date of Accident: June 28, 2012


DeAnna and Amos:

Per your request and for the benefit of your bankruptcy counsel in New Jersey you have asked me to provide you with a breakdown of disbursements which would be made absent the funds having to be paid into the bankruptcy estate. Accordingly, my accounting and breakdown of disbursements would be as follows:

Total Settlement:	<u>\$50,000.00</u>
Less:	
40% Contingency Fee	-\$20,000.00
Litigation Expenses/Client Costs Advanced by Counsel:	-\$1,777.26
Subrogation Claim Plymouth Rock Assurance Co.	-\$7,033.82
Subrogation Claim of Allstate Insurance Co.	<u>-\$3,511.54</u>
Total Fees, Costs and Subro claims	<u>\$32,322.62</u>
NET PROCEEDS TO BE DISTRIBUTED TO CLIENTS	<u>\$17,677.38</u>

I trust this is the information you and Mr. Russo. I understand you will be forwarding this document to his office. If additional information is needed please advise.

Sincerely,

  
Roger A. Felice  
Attorney at Law